

## **REMARKS**

### **I. Introduction**

With the cancellation herein without prejudice of claim 22, claims 14 to 21, and 23 to 27 are pending in the present application. In view of the foregoing amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

### **II. Rejection of Claims 14 to 27 Under 35 U.S.C. § 103(a)**

Claims 14 to 27 were rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of U.S. Patent No. 6,425,468 (“Yamamoto et al.”) and U.S. Patent No. 4,242,666 (“Reschovsky et al.”), or the combination of UK Patent Application No. GB 2 100 069 (“Hill et al.”) and Reschovsky et al. Claim 22 has been canceled herein without prejudice, thereby rendering moot the present rejection with respect to claim 22. It is respectfully submitted that the combination of Yamamoto et al. and Reschovsky et al., or Hill et al. and Reschovsky et al. does not render unpatentable the present claims for at least the following reasons.

In order for a claim to be rejected for obviousness under 35 U.S.C. § 103(a), the prior art must teach or suggest each element of the claim. See Northern Telecom, Inc. v. Datapoint Corp., 908 F.2d 931, 934 (Fed. Cir. 1990), cert. denied, 111 S. Ct. 296 (1990); In re Bond, 910 F.2d 831, 834 (Fed. Cir. 1990). In addition, as clearly indicated by the Supreme Court, it is “important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements” in the manner claimed. See KSR Int’l Co. v. Teleflex, Inc., 127 S. Ct. 1727 (2007). Further, the Supreme Court in *KSR* noted that the analysis supporting a rejection under 35 U.S.C. § 103 should be made explicit. M.P.E.P. § 2143.

Claim 14 relates to a system, including the features of drive units arranged on a movable part, each drive unit powered in a contactless manner by an inductive coupling to at least one primary conductor, in which *the at least one primary conductor is removably fixed to the drive units on the movable part, the at least one primary conductor being provided in at least one of (a) an indentation and (b) a cable duct of the drive unit.* Support for the amendments to claim 14 may be found in the specification, e.g., at page 6, lines 25 to 28; page 7, lines 2 to 4, and 23

to 25; page 8, lines 20 to 23, and 31 to 35; page 9, lines 28 to 33; and Figures 1a to 5g.

The combination of Yamamoto et al. and Reschovsky et al. does not disclose, or even suggest, all of the features included in claim 14. In this regard, Yamamoto et al. merely describes a feeder line 5 fixed on a guide rail 1, and a carrier vehicle having a pickup portion 24, in which the carrier vehicle moves relative to the guide rail. Col. 5, lines 41 to 55; and Figures 6 to 9C. Accordingly, Yamamoto et al. merely describes a pickup portion 24 that moves relative to a feeder line 5. However, nowhere does Yamamoto et al. disclose that its feeder line 5 is removably fixed to pickup portion 24 on the carrier vehicle. Indeed, the Final Office Action at page 2 admits that Yamamoto et al. does not disclose “at least one of primary conductor and the drive units fixed relative to each other.” Further, the feeder line 5 of Yamamoto et al. is not even provided near to a drive unit, i.e., motor M as shown in Figure 3, much less in an indentation or cable duct of the drive unit. Thus, Yamamoto et al. does not disclose, or even suggest, the features that *at least one primary conductor is removably fixed to drive units on the movable part, at least one primary conductor being provided in at least one of (a) an indentation and (b) a cable duct of the drive unit.*

The Final Office Action refers to Reschovsky et al. as assertedly disclosing the above-recited features of claim 14. However, Reschovsky et al. merely describes a primary winding 17 that is wound about the periphery of a second disk 29. Col. 3, lines 45 to 46; and Figure 2. Thus, Reschovsky et al. does not disclose, or even suggest, the features of *at least one primary conductor being provided in an indentation or a cable duct of a drive unit.*

Moreover, it is respectfully submitted that there is no motivation or other tenable rationale to combine Yamamoto et al. and Reschovsky et al. because as more fully set forth above, Yamamoto et al. specifically requires that its pickup portion 24 moves relative to the feeder line 5 on a guide rail 1. Thus, any proposed combination of Yamamoto et al. and Reschovsky et al. would vitiate the intended function of Yamamoto et al. Accordingly, the proposed combination of Yamamoto et al. and Reschovsky et al. does not disclose, or even suggest, the features that *at least one primary conductor is removably fixed to drive units on the movable part, at least one primary conductor being provided in at least one of (a) an indentation and (b) a cable duct of the drive unit.*

In addition, the combination of Hill et al. and Reschovsky et al. does not disclose, or even suggest, all of the features included in claim 14. In this regard, Hill et al. repeatedly states that “the primary and the secondary windings thereof [are] movable relative to each other.” Page 1, lines 21 to 22, 32 to 33, and 74 to 76; and Figures 1 to 3. Accordingly, Hill et al. merely describes secondary windings that move relative to primary windings. However, nowhere does Hill et al. disclose that its primary windings are removably fixed to secondary windings on a movable device. Indeed, the Final Office Action at page 3 admits that Hill et al. does not disclose “at least one of primary conductor and the drive units fixed relative to each other.” Further, the primary conductors of Hill et al. are not even provided near to a drive unit, i.e., electric motor 32 as shown in Figures 1 and 2, much less in an indentation or cable duct of the drive unit. Thus, Hill et al. does not disclose, or even suggest, the features that *at least one primary conductor is removably fixed to drive units on the movable part, at least one primary conductor being provided in at least one of (a) an indentation and (b) a cable duct of the drive unit.*

The Final Office Action refers to Reschovsky et al. as assertedly disclosing the above-recited features of claim 14. However, as set forth above, Reschovsky et al. merely describes a primary winding 17 that is wound about the periphery of a second disk 29. Col. 3, lines 45 to 46; and Figure 2. Thus, Reschovsky et al. does not disclose, or even suggest, the features of *at least one primary conductor being provided in an indentation or a cable duct of a drive unit.*

Moreover, it is respectfully submitted that there is no motivation or other tenable rationale to combine Hill et al. and Reschovsky et al. because as more fully set forth above, Hill et al. specifically requires that its primary and secondary windings are movable relative to each other. Thus, any proposed combination of Hill et al. and Reschovsky et al. would vitiate the intended function of Hill et al. Accordingly, the proposed combination of Hill et al. and Reschovsky et al. does not disclose, or even suggest, the features that *at least one primary conductor is removably fixed to drive units on the movable part, at least one primary conductor being provided in at least one of (a) an indentation and (b) a cable duct of the drive unit.*

Accordingly, the combination of Yamamoto et al. and Reschovsky et al., or Hill et al. and Reschovsky et al. does not disclose, or even suggest, all of the features included in claim 14. As such, it is respectfully submitted that the

combination of Yamamoto et al. and Reschovsky et al., or Hill et al. and Reschovsky et al. does not render unpatentable claim 14.

As for claims 15 to 21, and 23 to 27, which depend from claim 14 and therefore include all of the features included in claim 14, it is respectfully submitted that the combination of Yamamoto et al. and Reschovsky et al., or Hill et al. and Reschovsky et al. does not render unpatentable these dependent claims for at least the same reasons more fully set forth above.

In view of all the foregoing, withdrawal of this rejection is respectfully requested.

### III. **Conclusion**

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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